CORPORATE POLICY

Supplier and Third-Party Code of Conduct

POLICY NUMBER	OPES-POL-11
VERSION	IFC
POLICY OWNER	Compliance Officer
APPROVED BY	Board of Directors, 6 March 2025
EFFECTIVE DATE	6 March 2024
NEXT REVIEW	12 months after approval
APPLIES TO	Suppliers, subcontractors, consultants, agents and joint venture partners of OPES

1. Purpose

OPES expects the companies and individuals it works with to share its commitment to integrity, safety and respect for people and the environment. This Code sets out the minimum standards we require. Acceptance of this Code is a condition of doing business with OPES.

2. Minimum standards

2.1 Business integrity

- No bribery, facilitation payments, kickbacks or other corrupt practices, directly or through others
- No offering of gifts or hospitality to OPES personnel beyond modest, occasional courtesies
- Accurate invoices and records that reflect the real services delivered
- Disclosure to OPES of any conflict of interest, including family or financial links to OPES personnel or to public officials involved in the work
- Compliance with sanctions and anti-money laundering laws, and disclosure of beneficial ownership on request
- Fair competition, with no collusion or bid rigging

2.2 Labour and human rights

- No forced, bonded or trafficked labour, and no recruitment fees charged to workers
- No child labour, and no one under 18 in hazardous work
- Legal wages, working hours, written contracts and freedom of association
- No discrimination, harassment or abuse, including sexual exploitation, abuse and harassment

2.3 Health, safety and environment

- Compliance with applicable HSE law and OPES or client site rules, including the IOGP Life-Saving Rules where relevant
- Competent, trained and properly equipped workers
- Immediate reporting to OPES of any incident or near miss linked to OPES work
- Measures to prevent pollution and manage waste responsibly

2.4 Confidentiality and data

- Protection of OPES and client confidential information
- Lawful handling of personal data, including under Ghana's Data Protection Act, 2012 (Act 843) and, where relevant, the EU General Data Protection Regulation as applied in Norway

3. Due diligence and monitoring

OPES applies risk-based due diligence to third parties before engaging them, as described in the Anti-Bribery and Anti-Corruption Policy (OPES-POL-02) and the Sanctions and Anti-Money Laundering Policy (OPES-POL-10). Higher-risk third parties, such as agents interacting with public officials, receive enhanced checks. OPES may request information, carry out audits and review performance against this Code.

4. Subcontracting

Third parties must not subcontract OPES work without OPES's written consent, and must pass the requirements of this Code on to their own subcontractors.

5. Reporting concerns

Third parties and their workers can report concerns about OPES personnel or about breaches of this Code, confidentially and without fear of retaliation, through the channels in the Whistleblowing Policy (OPES-POL-04).

6. Breaches

Where a breach is found, OPES may require corrective action within a set time. Serious breaches, including bribery, forced or child labour, SEAH, sanctions breaches or wilful safety violations, will lead to termination of the relationship and may be reported to the authorities and to funders.

7. Acknowledgement

On behalf of the company named below, I confirm that we have read and will comply with the OPES Supplier and Third-Party Code of Conduct.

Company: _____

Name and title: _____

Signature: _____ Date: _____